

GLENN S. LEON  
Chief, Fraud Section  
Criminal Division, U.S. Department of Justice  
KYLE CRAWFORD  
Trial Attorney  
1400 New York Ave N.W.  
Washington, D.C. 20530  
Telephone: (202) 794-4010  
Email: kyle.crawford@usdoj.gov

JASON M. FRIERSON  
United States Attorney  
Nevada Bar Number 7709  
JESSICA OLIVA  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Telephone: (702) 388-6268  
Email: jessica.oliva@usdoj.gov

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
KOFI SARFO and  
ROSE SARFO,  
  
Defendants.

Case No.: 23-CR-132-APG-ESY

**Stipulation for Protective Order**

The parties, by and through the undersigned, respectfully request that the Court issue an order protecting from disclosure to the public, or any third party not directly related to this case, materials produced by the United States during discovery that contain confidential personal identifying information. The parties state as follows:

1. On July 18, 2023, a federal grand jury in the District of Nevada indicted defendants KOFI SARFO and ROSE SARFO on one count of conspiracy to commit wire

1 fraud in violation of 18 U.S.C. § 1349 and five counts of wire fraud in violation of 18 U.S.C.  
2 § 1343. ECF No. 1. In addition, the grand jury indicted KOFI SARFO on one count of  
3 money laundering in violation of 18 U.S.C. § 1957. On July 19, 2023, defendants KOFI  
4 SARFO and ROSE SARFO made their initial appearances and were arraigned in the District  
5 of Nevada.

6 2. Trial is currently scheduled for September 25, 2023. ECF No. 11.

7 3. The discovery to be produced in connection with this case contains hundreds  
8 of pages of documents obtained from a state agency and payroll company, which contains  
9 third-party tax information, taxpayer identification numbers, wage information, as well as  
10 personal identifying information, including the social security numbers and addresses of  
11 multiple individuals. The release of such information to the public or third parties not  
12 involved in the case could endanger the privacy of these individuals. This information is  
13 referred to here as the “Protected Information.” Because of the volume and extent of  
14 Protected Information contained in these documents, it is impracticable for the United States  
15 to redact these materials. Additionally, the defense may wish to review the Protected  
16 Information in the course of analyzing the discovery and preparing the defense. This  
17 discovery is identified at the materials bates-stamped DOJ-PROD-0000006127 – 8408 and  
18 DOJ-PROD-0000009633 - DOJ-PROD-0000009673.

19 4. In order to protect the privacy of these third-party individuals contained in the  
20 discovery, the parties stipulate that discovery at the above-referenced bates numbers (and  
21 such additional documents as the parties may designate) provided by the United States in  
22 preparation for, or in connection with, any stage of this case are subject to this protective  
23 order (“the Order”) and may be used by the defendants and defense counsel (defined as  
24 counsel of record in this case) solely in connection with the defense of this case, and for no

1 other purpose, and in connection with no other proceeding, without further order of this  
2 Court.

3         5.       The defendants and defense counsel shall not disclose Protected Information  
4 or their contents directly or indirectly to any person or entity other than persons employed  
5 to assist in the defense, persons who are interviewed as potential witnesses, counsel for  
6 potential witnesses, and other persons to whom the Court may authorize disclosure  
7 (collectively, “authorized persons”). Potential witnesses and their counsel may be shown  
8 copies of Protected Information as necessary to prepare the defense, but they may not retain  
9 copies without prior permission of the Court.

10       6.       The defendants, defense counsel, and authorized persons shall not copy or  
11 reproduce Protected Information except in order to provide copies of the materials for use in  
12 connection with this case by defendants, defense counsel, and authorized persons. Such  
13 copies and reproductions shall be treated in the same manner as the original materials. The  
14 defendants, defense counsel, and authorized persons shall not disclose any notes or records  
15 of any kind that they make in relation to the contents of the Protected Information, other  
16 than to authorized persons, and all such notes or records are to be treated in the same manner  
17 as the original materials.

18       7.       Before providing Protected Information to an authorized person, defense  
19 counsel must provide the authorized person with a copy of this Order.

20       8.       Upon conclusion of all stages of this case, including any appeals or collateral  
21 proceedings, all of the Protected Information and all copies made thereof shall be destroyed  
22 or returned to the United States, unless otherwise ordered by the Court.

23       9.       The restrictions set forth in this Order do not apply to documents that are or  
24 become part of the public court record, including documents that have been received in

1 evidence at other trials, nor do the restrictions in this Order limit the use of Protected  
2 Information in judicial proceedings in this case, except as described below.

3 10. Absent prior permission from the Court, Protected Information shall be  
4 redacted from any public filing in accordance with Fed. R. Crim. P. 49.1 and LR IC 6-1.

5 11. In the event of an inadvertent disclosure of Protected Information, the party  
6 making or learning of the inadvertent disclosure will immediately:

7 a. Notify the person to whom the disclosure was made that it contains Protected  
8 Information subject to this Order;

9 b. Make all reasonable efforts to preclude dissemination or use of the Protected  
10 Information by the person to whom disclosure was inadvertently made;

11 c. Notify the United States and other parties of the identity of the person to  
12 whom the disclosure was made, the circumstances surrounding the disclosure,  
13 and the steps taken to ensure against further dissemination or use of the  
14 information; and

15 d. Notify the Court in writing under seal.

16 12. Nothing in this Order shall prevent any party from seeking modification of this  
17 Order or from objecting to discovery that it believes to be otherwise improper.

18 13. This Order does not constitute a ruling on the question of whether any  
19 particular material is properly discoverable or admissible and does not constitute any ruling  
20 on any potential objection to the discoverability of any material.

14. The defense hereby stipulates to this protective order.

Respectfully submitted,

For the United States:

GLENN S. LEON  
Chief, Fraud Section  
U.S. Department of Justice

/s/ Kyle Crawford  
Kyle Crawford  
Trial Attorney

JASON M. FRIERSON  
United States Attorney  
District of Nevada

/s/ Jessica Oliva  
Jessica Oliva  
Assistant United States Attorney

For the Defense:

/s/ Kathleen Bliss  
Kathleen Bliss  
Attorney for Kofi Sarfo

s/ Paul Padda  
Paul Padda  
Attorney for Rose Sarfo

**IT IS SO ORDERED:**

  
HON. ELAYNA J. YOUCHAH  
UNITED STATES MAGISTRATE JUDGE

August 2, 2023

Date